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MICHAEL A. CARDOZO  
Corporation Counsel

THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NY 10007

JENNIFER L. RUBIN  
Assistant Corporation Counsel  
Phone: (212) 788-1029  
Fax: (212) 788-9776  
jerubin@law.nyc.gov

**MEMO ENDORSED**

July 2, 2007

**VIA HAND**

The Honorable Denise L. Cote  
United States District Judge  
500 Pearl Street  
New York, New York 10007

Re: Taylor, et al., v. City of New York, et al., 07 Civ. 4130 (DLC)

Your Honor:

I am an Assistant Corporation Counsel in the office of Michael A. Cardozo, Corporation Counsel of the City of New York, representing defendant City of New York. I write to respectfully request an enlargement of time from July 2, 2007 until August 31, 2007 for the City of New York to answer or otherwise respond to plaintiffs' complaint. Plaintiffs' counsel, Brett Klein, Esq., has agreed to the enlargement of time.

In accordance with this office's obligation under Rule 11 of the Federal Rules of Civil Procedure, we need time to investigate the allegations of the complaint. In this case, plaintiffs allege that one of the plaintiffs was, *inter alia*, falsely arrested by members of the New York City Police Department on or about March 1, 2006. Plaintiffs also allege that one of the plaintiffs was subjected to excessive force. Accordingly, it is necessary for defendant City of New York to acquire as much information as possible concerning this matter in order to properly assess the case and respond to the complaint. To that end, this office is in the process of forwarding to plaintiffs for execution a N.Y.C.P.L. §160.50 release so that we can access the sealed records from their underlying arrest.

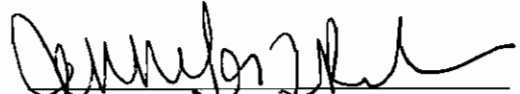
Accordingly, defendant City of New York respectfully request that their time to respond to the complaint be extended to August 31, 2007.<sup>1</sup>

<sup>1</sup> In addition to the City of New York, plaintiff has named John Doe defendants.

*Granted*  
*Denise Cote*  
*July 9, 2007*

Thank you for your consideration of this request.

Respectfully submitted,

  
Jennifer L. Rubin (JR 7938)  
Assistant Corporation Counsel

cc: Mr. Brett Harris Klein, Esq. (By Mail)  
Leventhal & Klein, LLP  
45 Main Street, Suite 802  
Brooklyn, NY 11201

Copies Sent To:

Brett H. Klein  
Leventhal & Klein, LLP  
45 Main Street, Suite 820  
Brooklyn, NY 11201

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ALL COUNSEL**